



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 20, 2019

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MR. MICHAEL CORDARO
BIOWORKS, INC.
D/B/A BIOWORKS
100 RAWSON ROAD, SUITE 205
VICTOR, NY 14564

Dear Mr. Cordaro:

Subject: Transfer of Pesticide Registrations and Data From Company Number **86729**
to Company Number **68539**

Pursuant to your request in your letter and transfer agreement of July 11, 2019, we have approved the transfer of the following registrations from A GROWING ALTERNATIVE, INC., company number 86729 to BIOWORKS, INC., company number 68539.

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
PERPOSE PLUS	86729-1	68539-15

You may continue to sell and distribute existing product stocks, bearing the transferor's label, for 18 months from the date of this letter. Per your request for an 18-month transition period, you may also continue to produce new product bearing the transferor's existing, previously approved label, and sell and distribute that new product, for 18 months after the date of this letter, but you may not sell and distribute product bearing the transferor's label after that 18-month period. Each product container or package bearing the transferor's label that is sold or distributed after the effective date of this product registration transfer must be clearly and accurately marked with the batch number, lot number, or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period, or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated July 11, 2019 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **BIOWORKS, INC.** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you wish to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval, please contact Louis Vaughn at (703) 308-8114.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Smith".

Kimberly Smith, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MS. SHERRY L. YOUNG
A GROWING ALTERNATIVE, INC.
751 FAIRVIEW CHURCH ROAD
SPRUCE PINE, NC 28777-

RE: L_86729_RAD_68539_08_20_2019